

## **Draft 2008 RTP and RTIP Conformity Re-determination for the 2006 PM2.5 National Ambient Air Quality Standards**

### **I. Introduction**

The U.S. EPA promulgated new PM2.5 National Ambient Air Quality Standards (NAAQS) on September 21, 2006 and issued a final rule on October 17, 2006. The final rule tightened the 24-hour PM2.5 standard from the 1997 level of 65 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) to 35  $\mu\text{g}/\text{m}^3$  while retaining the 1997 annual PM2.5 NAAQS of 15.0  $\mu\text{g}/\text{m}^3$ . Subsequently, EPA published a final rule in the *Federal Register* on November 13, 2009 designating areas for the 2006 PM2.5 NAAQS. In the SCAG region, two areas were designated as the PM2.5 non-attainment area: the South Coast Air Basin (SCAB) and the urbanized area of Imperial County. The area designations became effective December 14, 2009. As a result, conformity needs to be re-determined for the 2008 Regional Transportation Plan (RTP) and the 2008 Regional Transportation Improvement Program (RTIP) for the new PM2.5 NAAQS by December 14, 2010.

Under the U.S. Department of Transportation (DOT) Metropolitan Planning Regulations and U.S. EPA's Transportation Conformity Regulations, a conformity determination consists of five tests: consistency with the adopted RTP as previously amended, regional emissions analysis, timely implementation of transportation control measures (TCMs), financial constraint, and interagency consultation and public involvement.

The draft PM2.5 conformity re-determination reaffirms all of the applicable conformity findings for the 2008 RTP and the 2008 RTIP and addresses additional emissions analyses required for the new PM2.5 standard.

#### *Conformity Status of the Currently Conforming RTP and RTIP*

The effective date for the conformity determination for the 2008 RTP and the 2008 RTIP, including all of the air basins in the Southern California Association of Governments (SCAG) region, is November 17, 2008. The conformity determination is currently effective for four years; thus, the 2008 RTP and 2008 RTIP conformity will remain effective until November 17, 2012.

The PM2.5 conformity re-determination does not affect the existing conformity schedule for the RTP or RTIP. However, the new federal conformity regulation for PM<sub>2.5</sub> requires SCAG to make a positive conformity re-determination and receive approval from the U. S. DOT by December 14, 2010.

#### *Process for PM2.5 Conformity Determination on the 2008 RTP and the 2008 RTIP:*

1. Conduct interagency consultation through SCAG's Transportation Conformity Working Group (TCWG) which includes representatives from the respective air quality and transportation planning agencies.

2. Perform regional emission analysis. For the South Coast Air Basin, where there are existing PM<sub>2.5</sub> emission budgets, a budget test has been performed. For the urbanized area of Imperial County, where there are no existing PM<sub>2.5</sub> budgets, an interim emission test has been performed.
3. Reaffirm the existing conformity findings for the 2008 RTP and the 2008 RTIP.
4. Release the draft conformity analysis and documentation for the new PM<sub>2.5</sub> standard for a public review and comment period.
5. SCAG Regional Council adopts the resolution making the final conformity re-determination.
6. Send SCAG's Conformity Re-Determination to the federal agencies for approval.
7. Approval by federal agencies before December 14, 2014.

*Reaffirming Approved Conformity Findings for CO, NO<sub>2</sub>, Ozone, and PM<sub>10</sub>*

The PM<sub>2.5</sub> conformity re-determination includes a reaffirmation of the approved conformity findings for both the 2008 RTP and the 2008 RTIP as previously amended. This reaffirmation includes consistency with the adopted 2008 RTP as previously amended, regional emissions analyses, financial constraint test, timely implementation of TCMs, and interagency consultation and public participation.

## II. PM<sub>2.5</sub> Emissions Analysis

Table 1 presents the results of the budget test for the South Coast Air Basin.

Table 1. 24-hour PM<sub>2.5</sub> for the South Coast Air Basin (24-hour, Tons/Day)

Pollutant		2012	2020	2030	2035
ROG	Budget Plan	163	163	163	163
		154	107	81	73
Budget - Plan		9	56	82	90
NOx	Budget Plan	337	337	337	337
		308	176	122	114
Budget - Plan		29	161	215	223
PM2.5	Budget Plan	38	38	38	38
		36	36	37	38
Budget - Plan		2	2	1	0

For the urbanized area of Imperial County, where there are no existing PM<sub>2.5</sub> budgets, an interim emission test has been performed. The interim test used is to compare the projected direct PM<sub>2.5</sub> emissions and NO<sub>x</sub> emissions with base year 2008 emissions. Table 2 on the next page summarizes the results of the interim emissions test for Imperial County.

Table 2. 24-hour PM<sub>2.5</sub> for Imperial County (24-hour, Tons/Day)<sup>1</sup>

<b>Pollutant</b>		<b>2010</b>	<b>2020</b>	<b>2030</b>	<b>2035</b>
NO <sub>x</sub>	Base Year 2008	17.21	17.21	17.21	17.21
	Plan	15.32	8.68	8.24	8.65
Base Year - Plan		<b>1.89</b>	<b>8.53</b>	<b>8.97</b>	<b>8.56</b>
PM <sub>2.5</sub>	Base Year 2008	0.60	0.60	0.60	0.60
	Plan	0.55	0.43	0.47	0.50
Base Year - Plan		<b>0.05</b>	<b>0.17</b>	<b>0.13</b>	<b>0.10</b>

<sup>1</sup> This table is also the basis for determining the interim test for the annual standards.

### III. Conformity Determinations

SCAG has determined the following conformity findings for the 2008 RTP and the 2008 RTIP under the required federal tests for the new PM<sub>2.5</sub> standard:

#### Regional Emissions Tests

- Finding: The regional emissions for direct PM<sub>2.5</sub>, ROG, and NO<sub>x</sub> are less than the respective emissions budgets in the South Coast Air Basin.
- Finding: The regional emissions for direct PM<sub>2.5</sub> and NO<sub>x</sub> are less than the baseline year 2008 emissions in Imperial County for both 24-hour and annual PM<sub>2.5</sub> standards.

#### Reaffirmation of the 2008 RTP and 2008 RTIP Conformity Tests

- Finding: SCAG reaffirms the applicable conformity findings for both the 2008 RTP and the 2008 RTIP as previously amended, which can be found at:  
[http://www.scag.ca.gov/RTIP/final08/approvedamendments/SCAGFF24\\_012210.pdf](http://www.scag.ca.gov/RTIP/final08/approvedamendments/SCAGFF24_012210.pdf)
- This reaffirmation covers the findings for all applicable pollutants, including consistency with the adopted 2008 RTP as previously amended, regional emissions analyses, financial constraint test, timely implementation of TCMs, and interagency consultation and public participation.

#### Inter-agency Consultation and Public Involvement Test

- Finding: In addition to reaffirming the already conducted public involvement and interagency consultation test for the 2008 RTP and the 2008 RTIP, the PM<sub>2.5</sub> conformity re-determination will undergo an appropriate process for interagency consultation and public participation. This process includes TCWG consultations on March 23, 2010 and April 27, 2010. The draft conformity re-determination report will be released for a 30-day public review period. After the public review, the final conformity report will be presented to SCAG's Energy and Environment Committee and to SCAG's Regional Council.